PFPI
driven by data

Statement of Mary S. Booth, PhD, Partnership for Policy Integrity
EPA's teleconference on Biogenic C Science Advisory Board draft report
January 27, 2012

Thank you for the opportunity to comment. Overall, PFPI concurs with the SAB report's conclusions and congratulates the panel on its deliberations. We agree that the use of a regional scale is a central weakness of EPA's Framework and that by forgoing the anticipated future baseline approach, the Framework fails to capture the difference in CO2 concentrations the atmosphere sees from use of biomass.

Forests are already sequestering carbon that is emitted by the power sector. Because biomass emits more CO2 per unit energy than fossil fuels, replacing fossil fuels with biomass instantaneously increases emissions. Under EPA's framework, which substitutes space for time, a conclusion of no net increase in atmospheric CO2 from burning biomass is only supportable if there is also an instantaneous increase in carbon sequestration. However, there is nothing about cutting trees over *here* that makes trees over *there* grow faster. Regrowth of forests harvested for biomass can eventually compensate for biogenic carbon emissions, but this takes decades to centuries.

The SAB panel has essentially concluded that the approach adopted by the Manomet Study is the correct one. Only by comparing scenarios where biomass is burned for energy, versus scenarios where it is not, can we determine what the atmosphere "sees" when biomass substitutes for fossil fuels. Based on the Manomet Study's conclusions, the State of Massachusetts has drafted rules that will restrict the eligibility of biomass power for renewable energy credits, based on net facility emissions over a 20-year timeframe. The Massachusetts approach, which starts with stack-level accounting of CO2 emissions, can provide a model for EPA going forward.

The SAB's approach is better than EPA's accounting framework because it is facility-centric, not landscape-centric. It is in EPA's interest, and important for the integrity of the Clean Air Act, to as far as possible regulate CO2 the same way other pollutants are regulated. All other things being equal, it is the increase in stack emissions from burning biomass, and the decrease in forest carbon sequestration, that determine what the atmosphere sees. While of course we want to maximize terrestrial carbon sequestration, ultimately what matters for climate change is the CO2 in the atmosphere. Pollutants in the atmosphere are what the Clean Air Act cares about, too.

We do have two significant concerns with the SAB report. The first is the report's endorsement of a 100-year timeframe for considering net carbon emissions. This is not congruent with worldwide consensus by climate scientists that immediate reductions in CO2 emissions are necessary to mitigate the worst effects of climate change.

We are also concerned – and puzzled – by the report's recommendation that EPA perhaps adopt a certification system for biogenic emissions based on whether fuels are harvested "sustainably". This approach would completely negate the panel's own conclusion that it is necessary to calculate baseline emissions without biomass harvesting to properly account for biomass emissions. Sustainability of harvesting – a term that is not even defined in the report – is not a guarantee of carbon neutrality.